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## REMARKS

Claims 1-79 were pending at the time of examination. The applicants confirm that claims 80-83 have been withdrawn in response to the restriction requirement, and that the applicants have elected with traverse to prosecute claims 1-79. Claims 11-16 have been canceled and claims 1, 3-4, 8, 17-23 and 51 have been amended. No new matter has been added. The applicants respectfully request reconsideration based on the foregoing amendments and these remarks.

## Objections to the Specification

The Examiner objected to the specification on the basis that it contains hyperlinks, which may cause problems with regards to the potential for inclusion of new matter. The applicants respectfully disagree. The hyperlinks provided in the specification and appendices are merely examples that illustrate how hyperlinks per se are used in the systems and methods of the invention. The hyperlinks are not directed to any specific websites that might cause problems with potential inclusion of new subject matter. They are merely used in a way similar to a symbol or a name in order to illustrate the overall functionality of the systems and methods, and have no special meaning attached. Thus, the applicants respectfully request that the objection be removed.

The Examiner also objected to the specification because of the use of various trademarks. The applicants have identified all the occurrences of proper names, and concluded that none of them is used in connection with any specific products. Thus, the proper names not used in a trademark fashion, but are rather used as names of providers of various products, in which case they do not need to have the TM symbol attached to their names. Nevertheless, as the suppliers do need to be uniquely identified, the applicants have amended the specification to add the full names and locations of the companies mentioned in the specification.

The applicants believe that the specification is now in allowable form and submit that all the objections to the specification be removed.

## Claim Rejections - 35 U.S.C. § 102

Claims 1-8, 10-74 and 76-79 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Application Publication No. US 2003/0058277 A1 to Bowman-Amuah et al. (hereinafter Bowman). The applicants respectfully traverse the rejection for the following reasons.

As can be seen in paragraph [1018] of the applicants' specification, in general, the invention enables the provision of extra-enterprise application integration as a service by providing methods and apparatus for supporting the interchange of enterprise data through an open platform for enterprise application integration (EAI). This open platform overlays a public network (e.g., the Internet) and does not require business entities to heavily invest in specialized software and resources. This service facilitates EAI efficiently and affordably, in particular to small- and medium-sized enterprises (SME). More generally, the open platform of the present invention can be used to support services provided by business-to-business (B2B) enablers, system integrators, and other node enablers.

Bowman, on the other hand, is directed to a view configurer in a presentation services patterns environment, which assigns a view to a particular activity. A notification is received that a startup event of an activity has occurred. A reference to a first instance of an object created by the startup event of the activity is also received. When the notification and the reference are received, a view to launch is determined based on predetermined criteria, which may include user preferences, an experience level of a user, security profiles, and/or workflow settings. The view is associated with the activity and displayed. Alternatively, the activity can run without a corresponding view. The activity can operate on a machine separate from a machine of an end user (Bowman, paragraphs [0009]-[0010]).

Turning now to the specific rejections of the claims, claim 1 as amended is directed to a message routing method. The message routing method includes step (b) of "determining a route path for delivery of said message to one or more recipient services, said route path including one or more in-transit services, wherein said determining being based on one or more of: a reference to a service identified in said header element, a routing script defined by a sending service, a routing script defined by a recipient service, a routing script defined by an in-transit service;". As can be seen in paragraph [1039] of the specification, the in-transit services can operate on the message before the message reaches the recipient service. In-transit services perform useful operations on messages, such as data transformation, enrichment, cross-reference ID mapping, filtering, credit scoring, or the like. The in-transit services independently join the message interchange network and operate on messages through the standardized interface.

The Examiner alleges "the lotus service provide this delivering of email messages as well as determining a route to the receiver." The applicants assume that the Examiner refers to the Lotus Notes email service and agree that this service has the capability of delivering emails and determining a route to the receiver. However, the route path is a simple route path from a sender to a recipient, which is determined by an email address typed in by the sender and is not

determined so as to include any in-transit services of the type described above that operate on the messages before they reach the respective recipients. Furthermore the Examiner is making a very general allegation without providing any basis of support in Bowman or elsewhere as to how the route path is determined, whereas the claim limitation is very specific about how the determination of the route path is made. In particular, the determination is based on one or more of: a reference to a service identified in said header element, a routing script defined by a sending service, a routing script defined by a recipient service, and a routing script defined by an intransit service, as recited in claim 1, none of which is mentioned in Bowman.

Claim 1 further requires step (c) of "delivering said message to an in-transit service in said route path, wherein said in-transit service performs an identifiable operation on said message as said message travels from a sending service to a recipient service, the identifiable operation altering the content of the message to ensure that the message has the proper format for the recipient service." That is, the message is sent between two services and during the delivery, the message passes through an in-transit service that performs an identifiable operation on the message. The amendments that have been made to step (c) are intended to more clearly define what is meant by the expression "identifiable operation." That is, the identifiable operation alters the content of the message to ensure that the message has the proper format for the recipient service. The Examiner rejected this step referring to paragraphs [0680], [0911], [1013], [1363] and [1499] of Bowman. Paragraph [0680] of Bowman discusses the Lotus Forms product, which provides tools to design, route and track forms as they are sent within a workgroup or within an extended enterprise. Lotus Forms has two parts: Forms Designer, an application-development version, and Forms Filler, a runtime version for users. Nothing in Bowman's description of Lotus Forms suggests that there are in-transit services that perform identifiable operations of the type described above on the message. Paragraph [0911] discusses security issues for documents, and suggests that documents should be accessed exclusively through a document management backbone. If a document is checked-in, check-out, routed, viewed, annotated, archived, or printed it should be done only by users with the correct security privileges. Those access privileges should be able to be controlled by user, role, and group. The above claim limitation is not directed to resolving security issues for documents, and the applicants thus have some difficulty in understanding how this paragraph of Bowman is relevant to the claimed subject matter. Paragraph [1013] discusses Internet Telephony, which enables voice telephone calls (and faxing, voice mail retrieval, etc.) through the Internet. An Internet telephony product can accept voice input into a workstation, translate it into an IP data stream, and route it through the Internet to a destination workstation, where the data is translated back into audio. Paragraph [1363]

discusses Computer-Telephone Integration (CTI), which integrates computer systems and telephone systems to coordinate data and telephony activities. For example, CTI can be used to associate a customers database entry with the customers telephone call and route the call accordingly. Neither Internet Telephony nor CTI suggests or anticipates the limitations of claim 1. Finally, paragraph [1499] states that "Firewall Services protect sensitive resources and information attached to an Intxxnet network from unauthorized access by enforcing an access control policy. A variety of mechanisms exist for protecting private networks." Again, the recited claim limitation is not concerned with security issues and access control policies. The applicants respectfully submit that none of the paragraphs cited by the Examiner, alone or in combination, shows or suggests the step of "delivering said message to an in-transit service in said route path, wherein said in-transit service performs an identifiable operation on said message as said message travels from a sending service to a recipient service, the identifiable operation altering the content of the message to ensure that the message has the proper format for the recipient service." For at least these reasons the rejection of claim 1 is unsupported by the art and should be withdrawn.

Claims 2 and 11-16 have been canceled. Claims 3-10 and 17-31 all depend from claim 1, and are therefore neither anticipated nor obvious for at least the reasons discussed above with respect to claim 1, and the rejections of claims 3-10 and 17-31 should be withdrawn.

Claims 32-48 are directed to a message routing system and was rejected for the same reasons as the rejection of claims 1, 19 and 12-26, and is therefore allowable for at least the reasons discussed above with respect to claims 1, 19 and 17-26.

Claims 49-50 depend from claim 32 and are therefore allowable for at least the same reasons as claim 32.

Claim 51 is a Beauregard claim corresponding to claim 1, and is therefore neither anticipated nor obvious for at least the reasons discussed above with respect to claim 1, and the rejection of claim 51 should be withdrawn.

Claims 35-51 all depend from claim 34, and are therefore neither anticipated nor obvious for at least the reasons discussed above with respect to claim 34, and the rejections of claims 35-51 should be withdrawn.

Claim 52 is directed to a message routing network method. The Examiner alleges that FIG. 47 of Bowman shows step (a) of "receiving a registration request from a service for inclusion in a message routing network, said service being operative to provide a data operation;" The applicants respectfully disagree. FIG. 47, as described in paragraph [2657] of Bowman shows a workcell organization model and has nothing to do with receiving a

registration request, as recited in step (a) of claim 52. Step (b) of "including said service in a directory of services, said directory of services enabling users of said message routing network to define at least a portion of a desired data processing on a message" was rejected by the Examiner for the same reasons as claims 1 and 2, and is therefore not anticipated or rendered obvious for at least the reasons discussed above with respect to claim 1. Thus, the applicants respectfully request that the rejection of claim 52 be removed.

Claims 53-62 all depend from claim 52, and are therefore neither anticipated nor obvious for at least the reasons discussed above with respect to claim 52, and the rejections of claims 53-62 should be withdrawn.

Claim 63 is directed to a computer program product and was rejected for the same reasons as the rejection of claims 1 and 2, and is therefore allowable for at least the reasons discussed above with respect to claims 1.

Claim 64 is directed to a message routing system. The system includes a message routing network having an interface that enables a plurality of services to post messages to and receive messages from the message routing network. At least a portion of the services provide a menu of data operations that can be selectively applied to a message traversing the message routing network. The Examiner rejected this claim referring to paragraphs [0769], [0774] and [3019] of Bowman. The applicants respectfully disagree. Paragraph [0769] of Bowman discusses the customized menu feature of the Front Page web design tool. The customized menu is a menu bar with associated pull-down menus or context-sensitive pop-up menus. Paragraph [0774] discusses a different type of menu, an image map menu, which can be useful where all users share some visual model for how business is conducted. Paragraph [3019] discusses case tools that are used in repositories to identify categories of similar behavior such as the class hierarchy, where used, senders of, implementors of, etc. Case tools also provide search capabilities, but every tool uses a different method for finding artifacts, such as text searches for documents, menu provided searches in case tools, and where used and senders of within browsers. All the cited sections of Bowman merely refer to general "menu-related" topics, whereas the claim limitations are specific to refer to a message routing network with an interface that allows services to post messages and receive messages to/from the message network. Furthermore the menus recited in the claim contain data operations that can be selectively applied to a message traversing the message routing network. The applicants respectfully submit that no such menus are shown in the cited sections of Bowman, and that the rejection of claim 64 be removed for at least this reason.

Claims 65-79 all depend from claim 64, and are therefore neither anticipated nor obvious for at least the reasons discussed above with respect to claim 64, and the rejections of claims 65-79 should be withdrawn.

## Conclusion

The applicants believe that all pending claims are allowable and respectfully request a Notice of Allowance for this application from the Examiner. Should the Examiner believe that a telephone conference would expedite the prosecution of this application, the undersigned can be reached at the telephone number set out below.

> Respectfully submitted, BEŶER WÉAVER & THOMAS, LLP

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